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**rdenison@environmentaldefense.org**

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To: oppt.ncic@epamail.epa.gov, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, ggarvin@dow.com, NCIC HPV@EPA  
cc: lucierg@msn.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org

Subject: Environmental Defense comments on Crude 2-chloro-4-trifluoromethyl-3'-acetoxydiphenyl ether (CAS# 50594-77-9)

(Submitted via Internet 12/17/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and ggarvin@dow.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Crude 2-chloro-4-trifluoromethyl-3'-acetoxydiphenyl ether (CAS# 50594-77-9).

The test plan and robust summaries for Crude 2-chloro-4-trifluoromethyl-3'-acetoxydiphenyl ether (CTFADE) were submitted by Dow Chemical Company. CTFADE is used in the production of pesticides. However, no information is provided on the identity of those pesticides, how they are used or whether CTFADE residues remain in the pesticides. Therefore, we cannot evaluate the potential for environmental releases, or exposures to consumers, factory workers or farmers. Are there any residues of CTFADE found in the home, environment or on foodstuffs? The sponsor states on page 6 of the test plan that environmental or human exposures to CTFADE do not occur but no data are provided to substantiate this claim. While not strictly required, information on the uses and potential exposures to CTFADE would be extremely helpful in evaluating the likelihood of environmental releases or worker or consumer exposures. We would encourage the sponsors to include such information in the test plan.

The sponsor concludes that existing data, with the exception of fugacity data, are available to fulfill SIDS endpoints. Accordingly, the sponsor proposes to conduct fugacity modeling on CTFADE. We agree with the sponsors conclusions and proposal to conduct additional studies. In general, this plan is well-written and the robust summaries are remarkably detailed and informative. Specific comments are as follows:

1. CTFADE appears to be approximately 50% pure. What are the major contaminants in CTFADE and what is their toxicological relevance? Do any of the contaminants reach the environment or on foodstuffs?
2. CTFADE possesses moderate to high aquatic toxicity, with LC50 values ranging from 0.1-5 mg/l. Moreover, this substance is not biodegradable. These properties lend weight to our request for further information on uses and environmental levels of CTFADE.
3. There are adequate in vitro and in vivo data to demonstrate that CTFADE is not genotoxic.
4. The combined repeat dose/reproductive/developmental toxicity study has not been published, but the sponsor provides sufficient details to conclude that the study was well-conducted and that CFTADE has only slight toxicity to mammals. The combined study also included neurobehavioral assessments of parental animals and their offspring. We agree that the combined study

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reported in the robust summaries fulfills the requirement for repeat dose, reproductive and developmental toxicity studies. Our only question refers to the respiratory tract lesions observed in some animals. Were these lesions caused by CTFAD?

Thank you for this opportunity to comment.

George Lucier, Ph.D.  
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.  
Senior Scientist, Environmental Defense